

## RONEY LAND & CATTLE

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July 1, 2005

Docket No. 05-015-1  
Regulatory Analysis and Development  
PPD, APHIS, Station 3C71  
4700 River Road, Unit 118  
Riverdale, MD 20737-1238

To Whom It May Concern:

This comment is on behalf of Roney Land and Cattle (RLC) who represents over 100 years of ranching in Northern California.

Although current prices are at an all time high, price volatility and known swings in the livestock market, it's very predictable that this will not continue to be the case. In a long-term and historical view, the business of running cattle leaves a very small margin of profit. Knowing there is a limited amount of funds for USDA's implementation of the program compared to other countries already active in identification programs, RLC has several concerns on the expenses being passed on to the producer level.

Within these monetary concerns, RLC fears the current trend toward a system incorporating high technology input would not be to the economic benefit of all producers. Although, some segments of the industry may see management benefits of a high technology system able to identify individual animal identification. The added costs and time of monitoring each animal individually would cut into many producers' already slim margins of profit. It is for this

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reason that RLC supports the use of a low technology system with the identification being left to the premise itself and not the individual animal.

In keeping with monetary concerns, animal identification through the brucellosis program has proven to be very successful in trace-back ability. This program was successful with only about 25% of animals being tagged (one-half born heifers, then one-half kept as replacements). Market reports show that value added products bring higher prices in the market place; such as advanced vaccination or natural programs. Animal identification has already proven to add value to those animals that are source verified. Added marketability encourages producers to enroll in an identification system with the option of their added management bringing added monetary returns. With this type of opportunity it is very likely that far more than 25% of livestock producers would be involved in the program. Making the identification program mandatory would eliminate added demand for source verification, in turn adding another overhead cost to producers. Thus, it is recommended that the voluntary system be hastily implemented with a future reevaluation of its necessity for mandatory status.

RLC shares a national concern with confidentiality and liability due to the current Freedom of Information request that government is forced to deal with. Although legislation can be initially passed to protect the confidentiality of producers' information, RLC has great apprehension that future litigation will prove this legislation worthless. It is suggested that USDA work with private industry to develop a database that has more assurance of confidentiality than a government database. An example of this work can be seen through the National Cattlemen's Beef Association in developing a database.

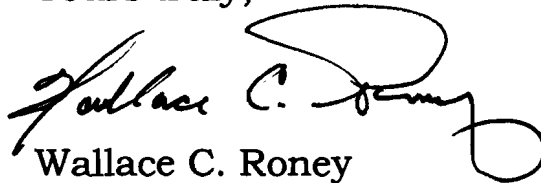
As California has implemented and often modified a very instrumental identification program through the use of a registered brand, which is tied to a premise number, RLC

suggests that any implementation of an identification system be made to run directly with a national brand registration.

Finally, RLC would like to add the importance of this plan being carried through the legislative process as its original intent, an animal health issue. Any use of this topic as a food safety issue would unnecessarily lower consumer confidence in a very safe product.

Thank you for the opportunity to comment on this important issue.

Yours truly,

A handwritten signature in black ink, appearing to read "Wallace C. Roney". The signature is fluid and cursive, with a large loop at the end of the last name.

Wallace C. Roney  
Roney Land & Cattle